REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed August 22, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 112, Second Paragraph

Claims 23-56 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. In particular, the Examiner states that it is unclear what the difference is between a "job request" and a "job ticket". Applicant disagrees.

As is described in the specification, a "job request" comprises a collection of data that is provided by the client to a service center for processing. The job request comprises two parts: (1) content to be printed, and (2) job ticket data that describes the format in which the content is to be processes. This arrangement is shown, for example, in Figure 1, which identifies content 3 and job ticket data 2. Neither of these aspects (e.g., files), however, comprises a "job ticket".

As is also described in the specification, a "job ticket" is a file that is created by a work flow controller 70 that receives or otherwise accesses the job ticket data provided in the job request. See, e.g., Specification, page 10, lines 13-17. Contrary to that stated in the Office Action, the job ticket does not comprise the content to be printed. Instead, the job ticket is a tool that is used to control what "processors" perform which actions in relation to the job that is to be performed. Therefore, a first processor (e.g., printer) may perform a first action in regard to a first portion of the content, and a second processor (e.g., printer) may perform a second action in regard to a second portion of the content.

The job may be split between two or more processors, for example, due to the different capabilities of the processors. For instance, one processors may only print in monochrome, while another may print in color. Therefore, the responsibilities for printing a document that comprises monochrome and color pages may be split. In another example, one processor may only perform simplex (i.e., one-sided) printing, while another may perform duplex (i.e., two-sided) printing.

In view of the above, Applicant asserts that there is no ambiguity in reciting both a "job request" and a "job ticket" as those terms are described and defined by Applicant's specification. Accordingly, Applicant respectfully requests that the rejections to the claims be withdrawn.

II. Claim Rejections - 35 U.S.C. § 103(a)

A. Rejection of Claims 23-25, 28-32, 35-38, 42-44, 48-51, and 54-56

Claims 23-25, 28-32, 35-38, 42-44, 48-51, and 54-56 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Motamed, et al. ("Motamed," U.S. Pat. No. 6,519,053) in view of Rosekrans, et al. ("Rosekrans," U.S. Pat. No. 5,450,571). Applicant respectfully traverses this rejection.

As has been acknowledged by the Court of Appeals for the Federal Circuit, the U.S. Patent and Trademark Office ("USPTO") has the burden under section 103 to establish a *prima facie* case of obviousness by showing some objective teaching in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *See In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). The Manual of Patent Examining Procedure (MPEP) section 2143 discusses the requirements of a *prima facie* case for obviousness. That section provides as follows:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teaching. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure.

In the present case, the prior art at least does not teach or suggest all of the claim limitations.

1.   The Motamed Disclosure

Motamend discloses a method and apparatus for smart job ticket processing. Motamed, Patent Title. In the disclosed method, a client computer creates a print job file and a smart print job ticket. Motamed, column 13, lines 39-46. The client computer then sends the print job file and the print job ticket to a printer server system. Motamed, column 13, lines 46-53.

The printer server system receives the print job ticket and the print job file. Motamed, column 14, lines 18-25. The printer server system then spools the print job file based upon the received print job ticket. Motamed, column 14, lines 25-27. Next, the printer server system creates a ripped print job, compresses the print job, and sends the compressed print job to a printer for processing. Motamed, column 14, lines 27-38.

2.   The Rosekrans Disclosure

Rosekrans discloses a filtering process for a printing system that filters out non-selectable print programming selections. <u>Rosekrans</u>, Patent Title. As is described by Rosekrans, the process begins with a user selecting a printer. <u>Rosekrans</u>, column 4, lines 20-24. Once the selection is made, an electronic job ticket is generated for presentation to the user to enable the user to select the various aspects of the print job (e.g., use of transparency media). <u>Rosekrans</u>, column 4, lines 12-17.

Given that the various different printers that are available to the user (e.g., on a given network) may have different capabilities, filtering is performed on the electronic job ticket before it is presented to the user. <u>Rosekrans</u>, column 4, line 63 to column 5, line 1. Specifically, the Rosekrans system applies a mask to the electronic job ticket such that the ticket that is displayed to the user only reflects the various tasks that the printer selected by the user is capable of performing. <u>Rosekrans</u>, column 5, lines 5-65. Therefore, to cite an example, if the printer the user has selected cannot print on transparencies, the transparency option is filtered out from the electronic job ticket that is presented to the user. <u>Rosekrans</u>, column 6, lines 17-29.

3.   Applicant's Claims

Applicant's claims contain limitations that are not taught or suggested by Motamed or Rosekrans. Applicant discusses those claim limitations in the following.

a.   Claims 23-25, 28-32, 35-38, 42-43

Independent claim 23 provides as follows (emphasis added):

23.   A method for completing jobs, comprising:

receiving a job request that includes content and data describing how the job is to be completed;

storing the content as one or more files;

creating a job ticket associated with the content using the data describing how the job is to be completed, the job ticket describing various tasks that must be completed to complete the job;

storing the job ticket;

assigning a processor to complete one or more of the tasks of the job; and

enabling the processor to access a limited portion of the job ticket associated with the one or more tasks and to access a portion of the stored content upon which the one or more tasks are to be performed, such that the processor can only complete the tasks to which the processor has been assigned.

As is described above, Motamed generally discloses receiving a print job file and a job ticket, processing the print job file in view of the job ticket, and sending the processed print job file to a printer. However, Motamed does not teach or suggest "creating a job ticket associated with the content using the data describing how the job is to be completed, the job ticket describing various tasks that must be completed to complete the job". The reason for this is that, as is described above, the client computer creates the job ticket and the printer server system merely processes the print job in view of the job ticket. No further job ticket is necessary or created. See, Motamed, column 14, lines 18-39. Given that Rosekrans is similarly deficient as to this aspect of claim 23, the rejection fails to teach or suggest all of the limitations of the claim for at least this reason.

As a further matter, Motamed does not teach or suggest enabling a processor (e.g., printer) to access "a limited portion of the job ticket associated with the one or

more tasks and to access a portion of the stored content upon which the one or more tasks are to be performed, such that the processor can only complete the tasks to which the processor has been assigned". Rosekrans also fails to teach or suggest such an aspect. As was noted in the previous Response and the Appeal Brief, Rosekrans is *silent* as to providing access to a "portion" of a job ticket associated with one or more tasks to be performed, or providing access to a "portion" of the stored content upon which the tasks are to be performed. Moreover, column 6, lines 4-8, and column 4, lines 25-37 of Rosekrans, do *not* provide such a teaching. Those portions provide as follows:

> When the print program selections are completed, the electronic documents 45 for the print job are normally placed in a document directory 70 in server 25 while the client/server job ticket 35-1 is sent to the print queue 42 selected.
> [Rosekrans, column 6, lines 4-8]

> Following this, the job ticket 35 for the job is programmed by the user at the client workstation. Following programming of the printing selections for the job, the client/Server Job Ticket 35-1 that is created is sent to the print queue 42-1, 42-2, 42-3, . . . 42-n selected. The electronic documents 45 that comprises the document papers to be printed, which may reside at the client 15 itself, or in a directory on server 25, or elsewhere in system 10, are also obtained. Where the file 45 resides in server 25, the client/server job ticket 35-1 includes a reference to the file location. Alternately, the file 45 may be prepended to the PDL file. A server/processor in server 25 processes the electronic documents 45 for printing by the selected printer.
> [Rosekrans, column 4, lines 25-37]

Clearly, neither of these passages provide a teaching of "enabling the processor to access a limited portion of the job ticket associated with the one or more tasks and to access a portion of the stored content upon which the one or more tasks are to be performed, such that the processor can only complete the tasks to which the processor has been assigned".

In view of the above, claim 23, and its dependents, are not obvious in view of Motamed and Rosekrans. Applicant therefore requests that the rejection be withdrawn.

b. Claims 44, 48-51, and 54-56

Independent claim 44 provides as follows (emphasis added):

44. A service center that receives job requests from clients, the service center comprising:

a job store that stores content of a job that is to be completed and provides access to the content;

a job ticket service that stores a job ticket that describes how the job is to be completed and provides access to the job ticket, *the job ticket comprising multiple branches that are associated with multiple tasks that must be completed to complete the job, the job ticket being associated with the stored content*; and

a workflow controller that creates the job ticket and assigns multiple processors to complete the multiple tasks of the job based upon the processors' ability and availability to complete the tasks;

wherein more than one processor is assigned to complete a the multiple tasks of the job such that multiple processors can be used to complete the same job.

Regarding claim 44, neither Motamed nor Rosekrans teach or suggest a job ticket service that stores a job ticket comprising "multiple branches that are associated with multiple tasks that must be completed to complete the job, the job ticket being associated with the stored content". Furthermore, neither reference teaches or suggests a workflow controller that "creates the job ticket and assigns multiple processors to complete the multiple tasks of the job based upon the processors' ability and availability to complete the tasks". Moreover, neither reference teaches or suggests that "more than one processor is assigned to complete a the multiple tasks of the job such that multiple processors can be used to complete the same job". In view of at least those reasons, the rejection cannot render claim 44, or its dependents, obvious.

c.   Conclusion

In summary, it is Applicant's position that a *prima facie* for obviousness has not been made against Applicant's claims. Therefore, it is respectfully submitted that each of these claims is patentable and that the rejection of these claims should be withdrawn.

B.   Rejection of Claims 26, 27, 33, 34, 39-41, 45-47, 52, and 53

Claims 26, 27, 33, 34, 39-41, 45-47, 52, and 53 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over <u>Motamed</u> and <u>Rosekrans</u> in view of <u>Nevarez, et al.</u> ("Nevarez," U.S. Pat. No. 6,389,421). Applicant respectfully traverses this rejection.
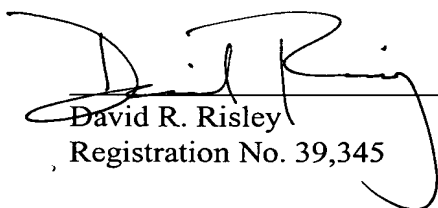
As is identified above, Motamed and Rosekrans do not teach various aspects of Applicant's claims. In that Nevarez does not remedy the deficiencies of the Motamed and Rosekrans references, Applicant respectfully submits that claims 26, 27, 33, 34, 39-

41, 45-47, 52, and 53, which depend from claims 23 and 44, are allowable over the

Motamed/Rosekrans/Nevarez combination for at least the same reasons that claims 23

and 44 are allowable over Motamed and Rosekrans.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

David R. Risley
, Registration No. 39,345

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Alexandria, Virginia 22313-1450, on

_____10-21-05_____.

_____Mary Meyer_____
Signature